

EXHIBIT A

JOINT CLAIM CONSTRUCTION CHART*Morpho Komodo LLC v. BLU Products Inc., et al.*, Case No. 2:15-cv-01100-JRG (Consolidated Lead Case)

DISPUTED CLAIM TERMS				
Ref. Num.	Claim Limitation	Plaintiff's Construction	Defendants' Construction	Court's Construction
1.	"computer" <i>('725 Patent Claims 1, 10, 15)</i> <i>('415 Patent Claims 2, 3)</i> <i>('078 Patent Claims 1, 9, 16, 20, 22)</i>	"a device having a processor, a memory, one or more devices with retention medium(s), and having the capacity to receive input from one or more input devices"	"a laptop or desktop computer"	
2.	"input device" <i>('725 Patent Claims 1, 3, 10, 15, 19)</i> <i>('415 Patent Claims 1, 6, 8, 9, 10, 13, 17)</i> <i>('078 Patent Claims 1, 3, 9, 20, 22)</i>	"a device by which a user enters input into a computer system"	"a device by which a user enters explicit input into a computer system"	

DISPUTED CLAIM TERMS				
Ref. Num.	Claim Limitation	Plaintiff's Construction	Defendants' Construction	Court's Construction
3.	<p>“user-selected device/ user-selected input device”</p> <p><i>(’725 Patent Claims 1, 2, 10, 15, 19)</i></p> <p><i>(’078 Patent Claims 1, 2, 9, 10, 20, 22)</i></p>	“device selected by the user by which the user enters input into a computer system”	<p>No construction, in view of construction of “input device”.</p> <p>If the Court is inclined to construe the term, Defendants propose:</p> <p>“an input device selected by the user”</p>	
4.	<p>“measurable variable input”</p> <p><i>(’725 Patent Claims 1, 10, 15)</i></p> <p><i>(’415 Patent Claims 13, 14, 15, 16, 17)</i></p> <p><i>(’078 Patent Claims 1, 9, 20, 22)</i></p>	“an input quantity that can vary and that must be measured, as opposed to an input that is distinctly identifiable”	“an input quantity that can gradually vary and that must be measured, as opposed to an input that is discretely identifiable”	

DISPUTED CLAIM TERMS				
Ref. Num.	Claim Limitation	Plaintiff's Construction	Defendants' Construction	Court's Construction
5.	<p>“signal”</p> <p><i>(’725 Patent Claims 1, 2, 3, 7, 8, 9, 10, 11, 13, 15, 16, 17, 18, 19, 20)</i></p> <p><i>(’415 Patent Claims 1, 12, 13, 14, 15)</i></p> <p><i>(’078 Patent Claims 1, 2, 3, 4, 9, 11, 12, 15, 20, 21, 22)</i></p>	“a set of related software-recognizable data which results from user input via an input device”	“a set of related software-recognizable data from a single transmission from an input device”	
6.	<p>“signature”</p> <p><i>(’725 Patent Claims 1, 3, 4, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20)</i></p> <p><i>(’415 Patent Claims 1, 5, 11, 12)</i></p> <p><i>(’078 Patent Claims 1, 4, 5, 8, 9, 13, 14, 16, 20, 21, 22, 23)</i></p>	“at least one transmission intended as a security precaution to preclude unauthorized access”	“a transmission intended as a security precaution to preclude unauthorized access to a computer”	

DISPUTED CLAIM TERMS				
Ref. Num.	Claim Limitation	Plaintiff's Construction	Defendants' Construction	Court's Construction
7.	“wherein creating said signature using recorded signals from a plurality of signal types” <i>(’725 Patent Claim 17)</i>	No Construction Necessary. Or in the alternative: “wherein creating said signature based at least in part upon at least a portion of said stored recording comprises using recorded signals from a plurality of signal types”	[indefinite]	
8.	“wherein passively terminative said recording” <i>(’725 Patent Claim 12)</i>	No Construction Necessary. Or in the alternative: “wherein terminating said recording comprises passively terminating said recording”	[indefinite]	
9.	“wherein recording a plurality of signal types for at least one-user-selected device” <i>(’725 Patent Claim 15)</i>	No Construction Necessary. Or in the alternative: “wherein recording user input signals by type from at least one user-selected device comprises recording a plurality of signal types for at least one user-selected device.”	[indefinite]	

DISPUTED CLAIM TERMS				
Ref. Num.	Claim Limitation	Plaintiff's Construction	Defendants' Construction	Court's Construction
10.	“wherein said recording comprises a plurality of user-selected devices” <i>('078 Patent Claim 10)</i>	No Construction Necessary. Or in the alternative: “wherein said recording comprises signal types from a plurality of user-selected devices”	[indefinite]	